

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

EXHIBIT H

June 27, 2022

STATE OF CONNECTICUT
SUPERIOR COURT
COMPLEX LITIGATION DOCKET
HELD AT WATERBURY
VOLUME III

- - - - -X

ERICA LAFFERTY, et al.,
PLAINTIFFS,

vs. X06-UWY-CV18-6046436-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

WILLIAM SHERLACH,
PLAINTIFF,

vs. X06-UWY-CV18-6046437-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

WILLIAM SHERLACH, et al.,
PLAINTIFFS,

vs. X06-UWY-CV18-6046438-S

ALEX EMRIC JONES, et al.,
DEFENDANTS.

- - - - -X

V I D E O T A P E D D E P O S I T I O N

The videotaped deposition of BRITTANY PAZ
was taken pursuant to notice at the offices of Koskoff
Koskoff & Bieder, PC, 350 Fairfield Avenue, Bridgeport,
Connecticut, before Viktoria V. Stockmal, RMR, CRR,
license #00251, a Notary Public in and for the State of
Connecticut, on Monday, June 27, 2022, at 10:11 a.m.

June 27, 2022

A P P E A R A N C E S:

ATTORNEYS FOR THE PLAINTIFFS:

KOSKOFF KOSKOFF & BIEDER, PC
350 Fairfield Avenue
Bridgeport, CT 06604
Tel: 203-336-4421
E-mail: asterling@koskoff.com
cmattei@koskoff.com
mblumenthal@koskoff.com

CHRISTOPHER M. MATTEI, ESQ.
ALINOR STERLING, ESQ. (Appearing remotely)
PRITIKA SESHADRI

ATTORNEYS FOR THE DEFENDANTS:

FOR ALEX EMRIC JONES, INFOWARS, LLC, FREE SPEECH
SYSTEMS, LLC, INFOWARS HEALTH, LLC and PRISON
PLANET TV, LLC:

PATTIS & SMITH, LLC
383 Orange Street, First Floor
New Haven, CT 06511
Tel: 203-393-3017
E-mail: npattis@pattisandsmith.com

ZACHARY REILAND, ESQ.

FOR GENESIS COMMUNICATIONS NETWORK, INC.:

BRIGNOLE, BUSH, & LEWIS, LLC
73 Wadsworth Street
Hartford, CT 06106
Tel: 860-527-9973
E-mail: mcerame@brignole.com

MARIO KENNETH CERAME, ESQ. (Appearing remotely)

ALSO PRESENT:

Joseph Raguso, Videographer

June 27, 2022

EXAMINATION BY MR. MATTEI:

Q Good morning, Ms. Paz.

A Good morning.

Q Welcome back. We were last here for your deposition on, I believe --

A Back in March.

Q -- March 16th. And so, before we start today, I observed that you had a set of typewritten notes before you. You've handed me a copy of those and these will be marked as the next exhibit in sequence. I don't know if we know what that will be right now or if we can just do that at the break.

MS. SESHADRI: 126.

(Plaintiff's Exhibit 126 was marked for identification: Typewritten notes.)

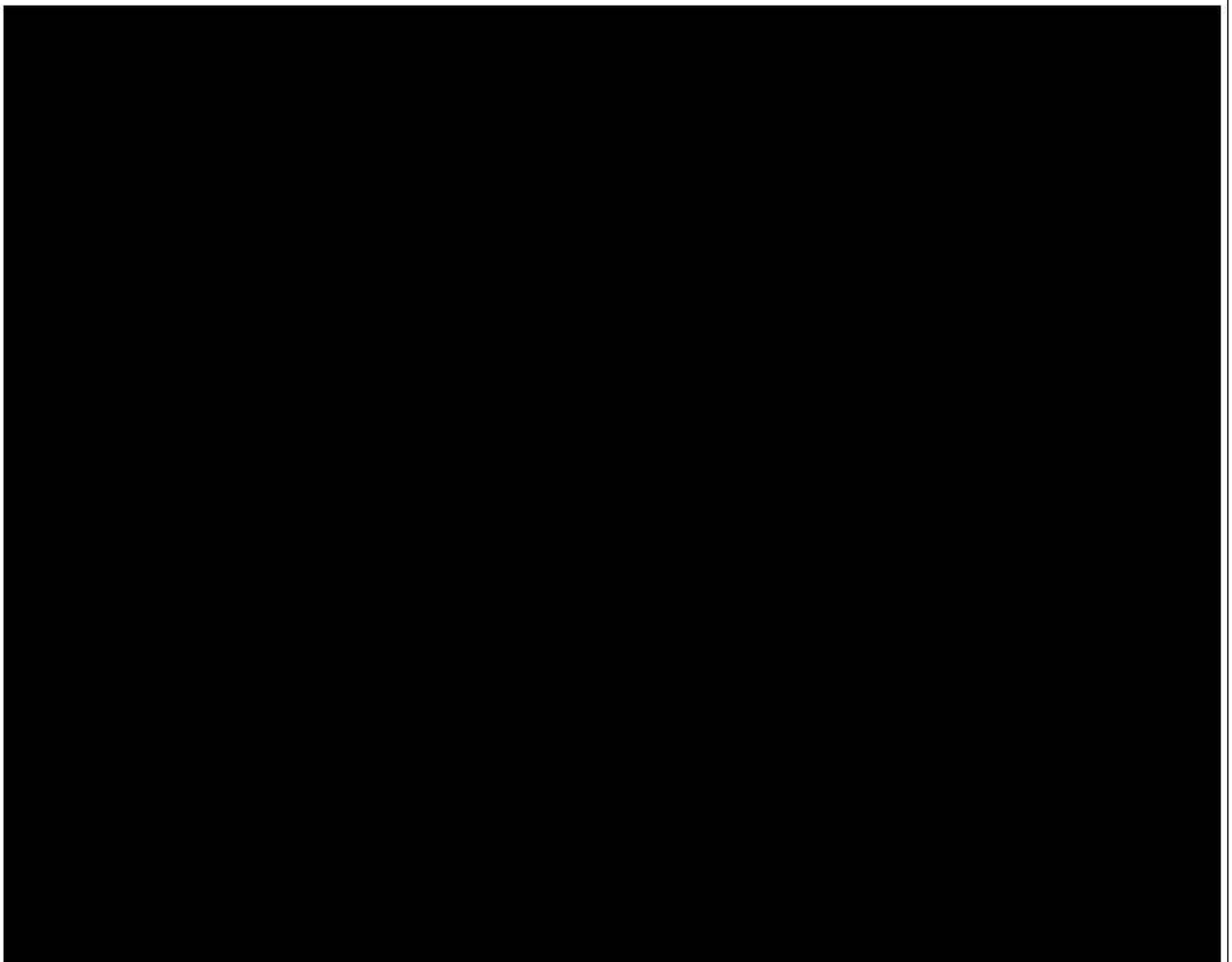
BY MR. MATTEI:

Q This will be Exhibit 126.

Ms. Paz, why don't you just explain to me what these notes are?

June 27, 2022

1 A Sure. After the last day of deposition, I went
2 through the deposition notice that was going to be for
3 today, but I think the day got moved because Mr. Jones
4 took a date; and then I thought that I needed to speak to
5 some more people on the rest of the questions; so, I
6 spoke to Blake Roddy, who is in charge of the marketing
7 and advertising for Free Speech and I also had a couple
8 conversations with Bob Roe and Mark Schwartz, I think.
9 They are the accountants that work with Free Speech about
10 the financial aspects of it, and I took some notes about
11 my conversations with them.



June 27, 2022

1 cases.

2 Q So, everything down until the part that says
3 Notes dash, that was all information that you obtained
4 either by virtue of your interview with Mr. Roddy or your
5 review of his deposition; correct?

6 A Yes.

7 Q Then you get to notes at the bottom which
8 starts with "to notes" and I'm assuming this refers to
9 the documents that were produced last week purporting to
10 be some sort of debt instrument between Free Speech
11 Systems and PQPR; correct?

12 A That is correct, yes.

13 Q Where did you obtain the information reflected
14 here at the very bottom?

15 A These are based on a couple conversations I
16 had. I had a video conversation with Mark Schwartz and
17 counsel. I also had, I believe, one video conference
18 with Bob Roe and maybe two phone calls basically
19 explaining the spreadsheets that I believe were produced
20 as well as the notes.

21 Q When did your conversation with Mr. Schwartz
22 and counsel take place?

23 A Within the last couple weeks after we scheduled
24 this date. So, within the last couple weeks.

25 Q Was it last week?

June 27, 2022

1 A It might have been the week before.

2 Q Okay.

3 Is that your best recollection that it was
4 probably a week before?

5 A Yeah, I don't remember the exact date of when
6 the conversation happened, but it was after this date was
7 scheduled and we knew that this date was happening.

8 Q Well, this date's been scheduled for quite a
9 while, so I just want to make sure I understand what your
10 best recollection is of when your conversation with
11 Mr. Schwartz and counsel may have taken place.

12 A Well, I wasn't --

13 Q Let me just finish.

14 A Oh, sure.

15 Q So, you indicated earlier that you thought it
16 was within the last couple of weeks. So, today is June
17 27th. Do you believe it was during the week beginning
18 June -- Sunday, June 12th?

19 A May I look at my calendar?

20 Q Yeah, please. Would that be a calendar entry?

21 A I might have put it in my calendar because it
22 was a Zoom call, so it might be in my calendar.

23 Q That would be great.

24 A Just give me one second.

25 So, I have it on my calendar as Friday, June

June 27, 2022

1 17th?

2 Q Okay.

3 And that's a Zoom call involving you, a
4 gentleman named Mark Schwartz and Attorney Pattis?

5 A It was Attorney Reiland.

6 Q Thank you.

7 Anybody else participate in that?

8 A No, it was just the three of us.

9 Q What's your understanding of who Mr. Schwartz
10 is?

11 A I believe he's an accountant working for Free
12 Speech.

13 Q Okay.

14 Where did you get that information?

15 A Attorney Pattis indicated he was the best
16 person to speak to regarding the financial questions that
17 were going to be in this deposition; so, that is who I
18 contacted.

19 Q Okay.

20 The financial questions, you're referring
21 specifically to the relationship between PQPR and Free
22 Speech Systems?

23 A The questions that were noticed in the
24 deposition, those questions.

25 Q What specific financial issues did you believe

June 27, 2022

1 he was going to be able to provide you information --

2 A He was going to be able to explain to me, for
3 example, one of the noticed questions was about
4 advertising. Who advertises, paid advertising to Free
5 Speech who -- and how we get paid for advertising. So,
6 he was able to pull information from our general ledger
7 and create some spreadsheets and then he explained those
8 to me. For example, one of the questions was questions
9 about Mr. Jones' compensation, he created a spreadsheet,
10 we had a conversation about the information that was in
11 there so I can cogently testify to it today. That kind
12 of thing.

13 Q You're referring to Mark Schwartz as having
14 been the individual who --

15 A I had --

16 Q Just let me finish my question.

17 A Okay, sure.

18 Q You collected that information and was in the
19 best position to talk about those issues on behalf of
20 Free Speech Systems?

21 A I had also spoken to Mr. Roe about that
22 previously.

23 Q I'm just specifically though talking about
24 Mr. Schwartz and the meeting you had with him on June
25 17th and what you were informed about his status with the

June 27, 2022

1 company, why he was in the position to give you
2 information concerning those issues. I just want to make
3 clear that you're speaking specifically about
4 Mr. Schwartz there being the one who collected
5 spreadsheets concerning Mr. Jones's compensation and
6 spreadsheets and information concerning advertising
7 activity of Free Speech Systems; is that correct?

8 A I don't know how to answer that question. I
9 don't know if he created those spreadsheets. All I know
10 is he was able to explain the spreadsheets to me.

11 Q Those spreadsheets being the ones related to
12 Free Speech Systems' advertising and to Mr. Jones's
13 compensation?

14 A If you would like to pull up the deposition
15 notice, I could indicate exactly which numbers I spoke to
16 him about.

17 Q No, no, I'm asking you about the spreadsheets
18 you were just voluntarily testifying about. So, I don't
19 want to present you -- I'm asking --

20 A Well, you asked me a question.

21 Q Just let me finish, Ms. Paz.

22 A Sure.

23 Q We have to do question and answer. It's going
24 to go a lot quicker if you just let me finish my question
25 and then you answer; okay?

June 27, 2022

1 Specifically, the spreadsheets that you were
2 referring to that Mr. Schwartz described for you and was
3 able to explain, you referred to them as being
4 spreadsheets relating to Mr. Jones's compensation and
5 advertising; is that correct?

6 A Yes. Among others.

7 Q Okay, great.

8 What other issues did he explain to you?

9 A If you would pull up the deposition notice, I
10 could tell you exactly which ones.

11 Q Why don't we pull up the re-notice for today.

12 Do you have that in front of you, Ms. Paz?

13 A Yes.

14 Q So, you would like us just to advance to the
15 topic section?

16 A Yes, that would be great.

17 If you could scroll down just a little bit
18 more. Wait, wait, wait. Too far, too far.

19 So, if you scroll up to No. 4. So, one of
20 those spreadsheets was the identities of any third
21 parties who provide with you marketing service. So, they
22 were able to -- when I say "they," I mean, Mark Schwartz
23 and Mr. Roe. I'm not sure --

24 Q I'm asking you specifically about Mr. Schwartz?

25 A I don't know who created those spreadsheets,

June 27, 2022

1 I'm not sure, so he was able to explain them to me.

2 Q Mr. Schwartz was?

3 A Yes.

4 Q And one of the spreadsheets Mr. Schwartz was
5 able to explain to you pertained to the information
6 described in item 4, third-party advertising services;
7 correct?

8 A Yes.

9 Q Okay. Continue.

10 A Then for No. 5, any third parties who had paid
11 Free Speech for advertising and our marketing service.

12 Q Mr. Schwartz described and explained those --
13 the information contained in those spreadsheets?

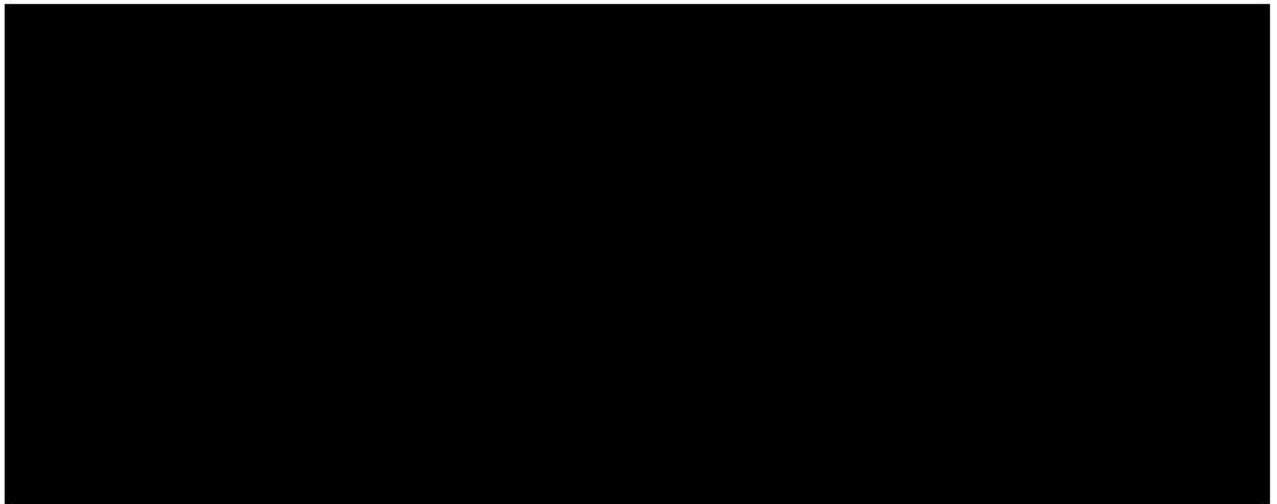
14 A Yes.

15 Then for No. 8, the compensation to Mr. Jones,
16 David Jones and Kelly Jones?

17 Q Mr. Schwartz explained that data to you?

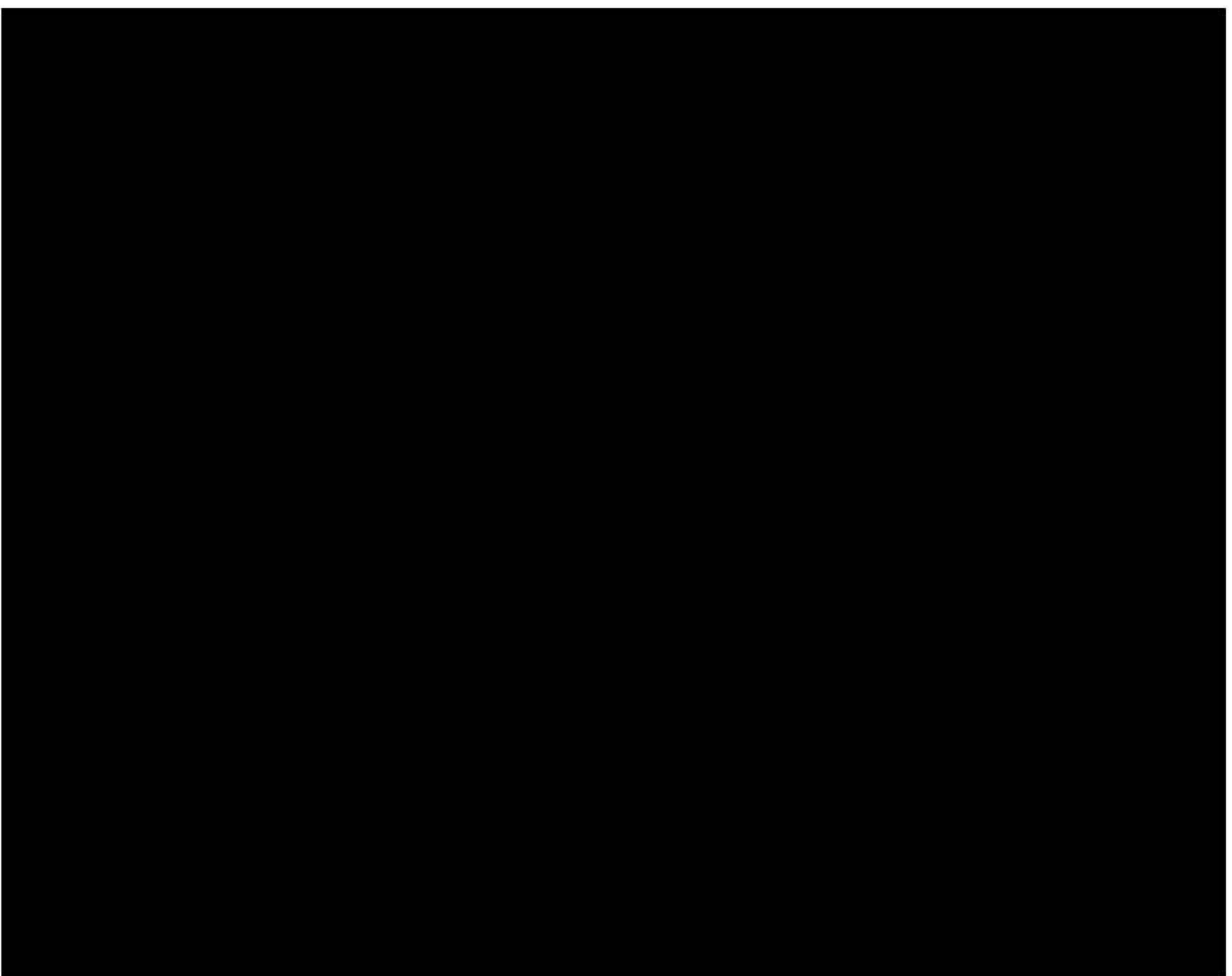
18 A Yes. We discussed that one.

19
20
21
22
23
24
25



June 27, 2022

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25



A We did discuss item 10, the transactions between the two companies, Free Speech and PQPR. And if you could scroll down -- I just want to make sure I have everything. I think that's it.

Q And so, Mr. Schwartz was described to you as an accountant working for Free Speech Systems?

A Yes, I don't know exactly what his relationship is to Free Speech. It may be a consulting relationship, I'm not sure. But I was given his information and told to contact him.

Q But I just want to make sure that what you

June 27, 2022

1 understand is that he is an accountant who is -- has some
2 relationship with Free Speech Systems, it sounds like you
3 believe in a consulting capacity?

4 A I don't know what capacity he's employed by
5 Free Speech, but that was the name of the person I was
6 told to contact, so I did.

7 Q And so, let me then just confirm that what you
8 were informed was that he was an accountant?

9 A I believe he's an accountant, yes.

10 Q Based on information that Attorney Pattis
11 provided to you?

12 A Yes.

13 Q Do you have any understanding of Mr. Schwartz's
14 involvement in Mr. Jones's recent bankruptcy petition on
15 behalf of three companies that he controls?

16 A No, I don't.

17 Q Were you aware that he was involved in that at
18 all?

19 A No, I'm not.

20 Q Did he -- okay.

21 How long was that meeting with Mr. Schwartz?

22 A I would say it was about an hour.

23 Q Let's pull up the two notes that were produced
24 to us last week.

25 These are -- what are these numbered?

June 27, 2022

1 MS. SESHADRI: 117 and 118.

2 BY MR. MATTEI:

3 Q Ms. Paz, do you have before you a document
4 captioned Promissory Note, dated August 13, 2020?

5 A Yes.

6 Q Have you seen this document before?

7 A Yes.

8 Q Did you discuss this document with
9 Mr. Schwartz?

10 A Yes. We did discuss the two notes and their
11 relationship to the payments that Free Speech makes to
12 PQPR.

13 Q Let's look at 18, too, if you can just identify
14 that, Ms. Paz. This is another document captioned as a
15 Promissory Note, dated November 10, 2021. Have you seen
16 this document before?

17 A Yes.

18 Q Did you discuss this with Mr. Schwartz?

19 A Yes.

20 Q Did you discuss both these document with
21 Mr. Roe as well?

22 A Yes. I had had communications with Mr. Roe
23 about the promissory -- the debt from Free Speech to
24 PQPR. I hadn't seen these, though, when I had those
25 conversations with him, so I didn't discuss the actual

June 27, 2022

1 documents with him. But I did discuss the debt with him.

2 Q Understood.

3 How did you first receive these two

4 documents?

5 A I asked for them and they were e-mailed to me.

6 Q When were they e-mailed to you?

7 A In the last week.

8 Q Who e-mailed them to you?

9 A I think Mr. Roe e-mailed them to me.

10 MR. MATTEI: I don't believe that we have

11 that e-mail, Zach. I don't think it was

12 included in what you provided last week.

13 MR. REILAND: That was probably sent after

14 that disclosure was gathered together, so we'll

15 start a new one.

16 BY MR. MATTEI:

17 Q So, you asked to see them and you asked --

18 A I asked for them, yes.

19 Q You believe Mr. Roe sent them to you last week?

20 A Yes.

21 Q Mr. Roe sent them to you last week --

22 A Well, within the last week. I'm not sure.

23 Within the last week.

24 Q So, when did you discuss them with

25 Mr. Schwartz?

June 27, 2022

1 A I had a phone call with Mr. Schwartz after the
2 Zoom meeting.

3 Q Okay.

4 So, in addition to your Zoom meeting, you had a
5 phone call with him and that was last week?

6 A Well, yes. It had to be last week because
7 today is Monday; so, yes.

8 Q The purpose of that phone call specifically was
9 to discuss these two documents?

10 A Yes, discuss the notes and any other questions
11 I had that were lingering, which weren't many. It was a
12 short phone call.

13 Q But you were aware during your initial
14 conversation with Mr. Schwartz on the 17th of the
15 existence of these notes which is what prompted you to
16 then ask him for them?

17 A Right.

18 Q We'll go over these in substance a little bit
19 later.

20 So, your notes at the very bottom, I take it
21 those notes are taken from your conversation with
22 Mr. Schwartz concerning the actual documents; correct?

23 A Right. So, these notes I didn't have the
24 actual document yet, we were talking about it in our Zoom
25 call. So, these were the notes from the Zoom call.

June 27, 2022

1 A Right.

2 Q And Free Speech Systems isn't prepared to
3 testify today concerning any relationship it has with the
4 website preparetoday.com; correct?

5 A Correct. I don't know that website.

6 Q And Free Speech Systems is not prepared to
7 testify today concerning any relationship it has with the
8 website preparewithalex.com; correct?

9 A Right. I don't know that website.

10 Q Is Free Speech Systems -- well, although Free
11 Speech Systems cannot testify as to whether it owns
12 infowarsstore.com, infowarsshop.com, Free Speech Systems
13 is aware that sales of PQPR products are transacted over
14 those websites; correct?

15 A Yes.

16 Q And the -- during the time period 2012 through
17 2020, proceeds from sales transacted over those websites
18 were processed by Free Speech Systems not PQPR; correct?

19 A No, I don't know that.

20 Q Okay.

21 So, Free Speech Systems' testimony is it does
22 not know whether it was responsible for transacting the
23 sales conducted on those websites; correct?

24 A No, I don't think, I don't know, I think that
25 PQPR transacts -- handles those transactions.

June 27, 2022

1 Q Okay.

2 A So, no, that's not correct.

3 Q So, Free Speech Systems' testimony is that PQPR
4 conducts the transactions -- the sales transactions over
5 InfoWars.com -- I'm sorry. Strike that. Let me begin
6 again.

7 Your testimony is that PQPR conducts the
8 transactions occurring over infowarsstore.com and
9 infowarsshop.com for the period 2012 through 2020?

10 MR. REILAND: I'll object to the form. I
11 think she said she didn't make the --

12 BY THE WITNESS:

13 A I don't understand -- yeah, I don't understand
14 the question.

15 Q Okay.

16 A I'm sorry, can you just repeat it.

17 Q Sure.

18 You testified that there are sales transactions
19 that occur on in for infowarsstore.com and
20 infowarsshop.com; right?

21 A Right.

22 Q When those sales occur during 2012 to 2020,
23 where were the sales proceeds routed?

24 A So, PQPR handles all of the product sales. If
25 you look at the spreadsheets, all of the product sales

June 27, 2022

1 websites, infowarsstore.com and infowarsshop.com, during
2 the period 2012 to 2019 [Verbatim], were any Free Speech
3 Systems' employees involved in processing those
4 transactions?

5 A No, PQPR processes the transactions, so they
6 are PQPR employees.

7 Q How many people does PQPR employ?

8 A I don't know.

9 Q Are any Free Speech Systems' employees, during
10 the time period 2012 through 2020, involved in any
11 activities on behalf of PQPR?

12 A I'm sorry, can you repeat the question.

13 Q Yeah.

14 For the time period 2012 through 2020, were any
15 Free Speech Systems' employees engaged in any activities
16 on behalf of PQPR?

17 A I don't know. I don't know how to answer that
18 question. I don't know.

19 Q Okay.

20 Well, let me ask it this way then: You
21 testified earlier that PQPR handles all transactions of
22 its products, sales; correct?

23 A Right, it does all the fulfillment of the
24 order, it houses all of the products and it, you know,
25 generally just fulfills all of the orders.

June 27, 2022

1 Q Okay. All right.

2 So, let's break that down. So, you say that
3 PQPR handles all the fulfillment of its -- did you say
4 products?

5 A Right, all the products that it sells and are
6 linked back from the website, from the Free Speech's
7 website via ads to the store. It has a staff, it has a
8 warehouse. They package everything. They house it.
9 They fulfill the orders. I did tour the warehouse, so
10 they have a whole process about how that happens. And
11 PQPR handles that.

12 Q Okay. So --

13 A It's --

14 Q Free Speech Systems' testimony is that when it
15 comes to the sale of PQPR products, PQPR owns the
16 warehouse where those products are stored; correct?

17 A I don't know if it owns it or rents it or
18 leases it. I don't know.

19 Q Okay.

20 PQPR staff, by which I assume mean employees,
21 handle the fulfillment of all those orders; correct?

22 A That's correct.

23 Q And PQPR employees handle all the accounting
24 for PQPR's books and records; is that right?

25 A I mean, I don't know how they do their internal

June 27, 2022

1 things. I don't represent PQPR. So, however they do
2 that her internal business, I don't know.

3 Q Okay.

4 But Free Speech Systems' employees don't
5 fulfill that function for PQPR, that is the accounting
6 function?

7 A Right. They have -- It's separate. They are
8 two separate entities.

9 Q And so, on the fulfillment piece, I take it
10 that your testimony is that that involves receiving
11 notice of any sale of a PQPR product, pulling that
12 product for shipment, shipping it; anything else?

13 A I mean, like I said, I don't know how their
14 internal operations work there. I mean, I did tour the
15 warehouse. They showed me how they stock everything.
16 They showed me how they pulled an item, how it was
17 labeled then for packaging. And then where it was
18 ultimately shipped out. Aside from that, their internal
19 processes, I don't know. I know they have some software
20 that helps them with that. I don't know the name of it.
21 I don't know how it works.

22 Q Basically, anything that goes into fulfilling
23 an order once it has been made by a customer, PQPR
24 employees handle; correct?

25 A Right.

June 27, 2022

1 Q Free Speech Systems' employees do not?

2 A Correct.

3 Q Who gave you a tour of the warehouse?

4 A I went with Attorney Blott when he was down in
5 Austin.

6 Q Okay.

7 And she's outside counsel retained by Free
8 Speech Systems to represent them in Texas; correct?

9 A Right. Although I don't know if she's involved
10 any longer, but she was when I was there and so she and I
11 went.

12 Q Who were the PQPR employees who showed you kind
13 of the fulfillment process that you were just describing?

14 A You know what, I'm so sorry, I don't remember
15 their name. I don't remember.

16 Q Okay. Okay.

17 And it's your understanding that PQPR, whether
18 it owns or leases the warehouse, pays for that facility
19 in order to use that facility; correct?

20 A I would assume so.

21 Q Free Speech Systems does not?

22 A I don't know. I don't represent PQPR, so I
23 don't know what they do to handle their warehouse.

24 Q Okay.

25 Free Speech Systems, though, has no involvement

June 27, 2022

1 in --

2 A That's correct.

3 Q -- sorry, just let me finish.

4 Free Speech Systems has no involvement in
5 paying for or managing that warehouse operation;
6 correct?

7 A Right.

8 Q And the information that you had just been
9 testifying to about PQPR -- PQPR's activities as distinct
10 from Free Speech Systems was who?

11 A I'm sorry, who told me that they were distinct?

12 Q Not just distinct, but who informed you that
13 PQPR employees and resources are responsible for the
14 fulfillment and administrative activities of PQPR as
15 opposed to Free Speech Systems' employees?

16 A I think that would be based on my conversations
17 with Mr. Jones, with Mr. Roe while I was down there, my
18 conversations with counsel which I'm not going to go
19 into. I think that would form the basis of that.

20 Q What, specifically, did Mr. Jones tell you
21 about PQPR?

22 A That Free Speech and PQPR are separate and that
23 they are -- they handle essentially the product sales and
24 he is engaged in the function of being on air. So, in
25 his mind, his business is being on the air.

June 27, 2022

1 that there wasn't any crossover between employees;
2 because I'm not sure. And I didn't ask that specific
3 question about whether in 2012, ten years ago, maybe,
4 free Speech employees were at PQPR. I just don't know,
5 so I don't want to mislead you and say I know when I
6 don't.

7 Is that clear?

8 Q It is except now I want to want to go back to
9 your earlier testimony. I take it your testimony
10 concerning the fact that PQPR employees now run all PQPR
11 business activities has to do with how -- the current
12 situation at PQPR?

13 A Well, no. I mean, I don't think it's just the
14 current situation. I mean, obviously the financial
15 situations currently there have been efforts made to make
16 sure that they're more separate, there's more delineated
17 payments between the two, everything is a little bit
18 more, you know, accounting-wise, up to speed. But as far
19 as the process goes, you know, the relationship between
20 the employees there, I'm just not sure. And I don't
21 think it's something that's recent that's happened; so I
22 don't think that's correct. But I just don't want to say
23 that going back ten years whether any Free Speech
24 employees have never been employed at PQPR. I just don't
25 know the answer to that.

June 27, 2022

1 Q So, at least -- I mean, is Free Speech Systems
2 prepared to say that, at least as of the initiation of
3 this lawsuit, the fulfillment that PQPR's maintained it's
4 own employee work force for the purpose of fulfilling all
5 of PQPR business activities?

6 A Right. They have their own employees. I think
7 they always -- they've had their own employees. I just
8 don't want to say whether or not there's been people
9 working at PQPR who've also worked for Free Speech. I
10 just don't know the answer to that. But they do maintain
11 their own work force. Yes.

12 Q Okay. So -- and I totally understand that.
13 There might be somebody who, at one point, worked for
14 Free Speech Systems and then works for PQPR. But fair
15 to say that if somebody is working for PQPR they are
16 employed there; correct?

17 A Right.

18 Q And that has been the case as far as you know
19 going back until --

20 A As far as I'm aware, yes.

21 Q I would like to talk about PQPR ownership;
22 okay?

23 A If I can help you with that --

24 Q There's an alphabet soup.

25 A Yes. If I can help you there, I will do my

June 27, 2022

1 best to do so.

2 Q You've testified about this in Texas; correct?

3 A I did, yes.

4 Q And when was PQPR formed, approximately? You
5 don't need to give me a specific date?

6 A You know what, I don't recall.

7 Q Okay.

8 One of the reasons obviously that you're
9 required to testify about this is because you're here to
10 testify in part about Mr. Jones's compensation;
11 correct?

12 A Yes.

13 Q And when -- just give me one second.

14 When PQPR was first formed, Mr. Jones exercised
15 a controlling interest in it through another corporate
16 entity; correct?

17 A Yes.

18 Q And what was that corporate entity called?

19 A I think it's called PLJR. Like you said,
20 alphabet soup. So, I believe PLJR has a 80 percent
21 interest in PQPR. PLJR is then owned by the AEJ Trust --

22 Q Hold on a second.

23 A You want --

24 Q The AEJ Trust came on later; right?

25 A Yes.

June 27, 2022

1 A Sure.

2 Q PLJR was owned 90 percent by Mr. Jones
3 personally and 10 percent by Carol Jones; correct?

4 A Prior to 2018?

5 Q Yes.

6 A I think so. I think that's what that document
7 says, yes.

8 Q And then, as a result -- and then PLJR had an
9 80 percent stake in PQPR; correct?

10 A Right.

11 Q And so, by virtue of his 90 percent stake in
12 PLJR and PLJR's ensuing 80 percent interest in PQPR,
13 Mr. Jones personally had, indirectly, 80 percent
14 ownership of PQPR; correct?

15 A Of PQPR?

16 Q Yes.

17 A I believe the total effective number would have
18 been in the 70s. It's, like, 72 percent effective;
19 because PQPR is owned 20 percent by Dr. and Mrs. Jones;
20 and then 80 percent by PLJR who also has a 10 percent
21 interest to Carol Jones. So, when you average out those
22 numbers, it's something like 72 percent.

23 Q Who did that math for you?

24 A Mr. Roe did that math for me. I am very bad at
25 math.

June 27, 2022

1 Q That's okay. I wouldn't expect you to have
2 done it.

3 A Yes.

4 Q So then, in 2018, I take it that your testimony
5 is that Mr. Jones transferred his personal ownership of
6 PLJR to the AEJ Trust; correct?

7 A To the trust, right.

8 Q And so, whereas Mr. Jones, prior to 2018, had a
9 72 some-odd percent indirect ownership interest in PQPR,
10 now the AEJ 2018 Trust does; correct?

11 A Right.

12 Q What instrument was -- have you seen any
13 documents reflecting that transfer of ownership?

14 A I don't think so, no.

15 Q Did you ask?

16 A I don't remember if I asked or not to be
17 honest.

18 Q So -- and Mr. Jones told you specifically that
19 that was done in order to benefit his children?

20 A Right. Because his children are remaindermen
21 in the trust. So, yes.

22 Q And what that means is that those children do
23 not receive any benefit from the AEJ Trust's ownership of
24 PQPR until Mr. Jones passes; correct?

25 A Right. They don't currently receive any income

June 27, 2022

1 from the trust.

2 Q The trust does generate income; correct?

3 A It is generating income, yes.

4 Q How is it generating income?

5 A It is generating income on the basis of the
6 notes that Free Speech pays to PQPR.

7 Q Which started when?

8 A So, those payments, I believe, started at the
9 end of last year, some time toward the end of last year,
10 maybe November.

11 Q That is November of 2021?

12 A Right.

13 So those payments are approximately \$11,000 per
14 business day from Free Speech to PQPR.

15 Q And the initiation of those payments of \$11,000
16 from Free Speech Systems to PQPR was initiated why?

17 A To pay down the debt between the two companies.

18 Q Who authorized Free Speech Systems to begin
19 paying that purported debt?

20 A I would assume Alex did.

21 Q Are you --

22 A I didn't ask, but there is a debt and it needed
23 to be paid. There were efforts made to make sure that
24 there was, you know, all of this financial entanglement
25 between the two companies to separate everything and make

June 27, 2022

1 sure that everything was accounted for and paid. So,
2 prior to that, I don't think that there was any clear
3 delineation. And so, there have been efforts made over
4 the last year to do that. And so, I would assume Alex
5 authorized it.

6 Q Okay.

7 You're not aware -- Free Speech Systems isn't
8 aware of anybody else who could authorize Free Speech
9 Systems to make \$11,000 daily payment to another
10 corporate entity; correct?

11 A No, I think Alex would have to authorize it.
12 He owns Free Speech.

13 Q And Free Speech's testimony here today is that
14 those payments, beginning in November of 2021, were
15 motivated solely to pay down a debt Free Speech Systems
16 purportedly owed to PQPR; is that your testimony?

17 A That's my understanding of the purpose of the
18 notes, yes.

19 Q And how did Free Speech Systems arrive at the
20 \$11,000 number?

21 A I think it's based on the terms of the note.

22 Q Which note?

23 A So, the first note is a 30-year note with a
24 balloon at the end. But the second note is principal --
25 it delineates principal and interest.

1 Q Why don't we pull them up. Let's pull up
2 Exhibit 117, because I just saw you were referring to
3 your notes of your conversation with Mr. Schwartz;
4 correct?

5 A Yes. That's when he was explaining to me the
6 notes and the agreement between the two notes.

7 Q All right.

8 So, we pulled up the first one. This is dated
9 August 13th, 2020, and tell me what Free Speech Systems'
10 understanding is of the purpose of this document and
11 what, if any, obligations Free Speech Systems' undertakes
12 pursuant to it?

13 A So, this looks like the first note for
14 approximately \$29.5 million and it outlines the principal
15 balance, if you scroll down.

16 Q Let's do that. Yep.

17 A It also --

18 Q Hang on.

19 Can you just identify what that is when you say
20 principal balance; what is it you're referring to?

21 A So, in Subsection B, it talks about the
22 principal balance, which is the 29.5 million and then
23 there's a percentage rate for interest on those days and
24 how they're calculated.

25 Q Let me stop you right there.

June 27, 2022

1 A Sure.

2 Q In -- I'm sorry. Go up to the stop, please,
3 I'm sorry.

4 On August 13th of 2020, Free Speech Systems
5 entered this note claiming to owe \$29.5 million to PQPR;
6 correct?

7 A Yes.

8 Q And it agreed to pay an interest rate, can you
9 scroll back down, of 1.75 -- an annual interest rate of
10 1.75 percent on that principal; correct?

11 A Right.

12 Q All right.

13 And it agreed to do -- make monthly payments on
14 that principal and interest pursuant to this note?

15 A I'm not sure if the monthly -- I'm sorry, daily
16 payments are outlined here.

17 Q I said monthly -- I meant daily.

18 A Yeah, it's daily.

19 So, I don't know if the daily payments of the
20 \$11,000 per number is in here.

21 Q Is it your understanding that the daily \$11,000
22 payment equates to a principal and interest payment on
23 this balance and interest rate set forth in this note?

24 A You mean when you divide it up, will it come up
25 to \$11,000 a business day?

June 27, 2022

1 Q Yeah. Really, what I'm asking is how did
2 Mr. Jones arrive at the \$11,000 per day number and is it
3 based on this note executed in August 2020?

4 A I don't know how the \$11,000 was arrived at. I
5 don't know if you divide it up and it comes out to
6 \$11,000 per day over the period of time. Because --

7 Q What's the term of this note?

8 A Because the term of the note is 30 years.

9 Q Okay.

10 A Because it expires in 2050.

11 Q Is Free Speech Systems' testimony that when it
12 entered this purported promissory note, that it was
13 agreeing to pay back the some \$29.5 million with the 1.75
14 interest rate over 30 years?

15 A Right.

16 Q But you don't know whether the \$11,000 daily
17 payment is toward the arrangement set out in this note?

18 A No, it is.

19 Q It is.

20 A Those two notes total -- the \$11,000 per
21 business day is for both notes. Right.

22 Q I see.

23 Well, then --

24 A I just don't know how they arrived at that
25 figure. If you are asking how they arrived at it, I'm

June 27, 2022

1 not sure if you divide it up over 30 years at 1.5 percent
2 it comes out \$11,000 per business day. I just -- I'm not
3 sure. So --

4 Q Did Free Speech Systems start making payments
5 on this note in August of 2020, immediately?

6 A I don't know.

7 Q Okay.

8 A I'm not sure.

9 Q When did the \$11,000 payments start?

10 A I believe, based on my conversations with
11 Mr. Roe and Mr. Schwartz, those were happening towards
12 the end of last year. So, in 2021.

13 Q So, Free Speech Systems today is not prepared
14 to testify about any payments on this purported debt
15 prior to approximately November of 2021; correct?

16 A Right. I don't know if the payments had been
17 made prior to that. I know they were definitely at the
18 end of last year. But I don't know if they had been made
19 prior to that.

20 Q All right.

21 So, you don't know then whether the AEJ Trust
22 2018 had any income prior to the initiation of \$11,000
23 payments in November of 2021; correct?

24 A Oh, you mean the income that's being -- that
25 would be thrown off by the \$11,000 per day?

June 27, 2022

1 Q Right.

2 A So, I mean, there were payments being made
3 between PQPR and Free Speech. So, PQPR was billing Free
4 Speech during this entire time period and they were
5 making payments, they just were not regular payments.

6 Q We're talking about payments from Free Speech
7 Systems to PQPR?

8 A Right.

9 Q And we're talking about PQPR payments then to
10 the AEJ Trust?

11 A Right.

12 Q So, I'm focused right now just on paid income
13 generated by the trust as a result of it's new ownership
14 in PQPR debt.

15 A Right.

16 Q And what I hear you saying is that that income,
17 as far as Free Speech Systems is prepared to testify
18 today, commenced in about November of 2021; correct?

19 A No. Because Free Speech was still making
20 payments to PQPR. They were just not the entire
21 payments; you understand?

22 Q I do, but what --

23 A So, those payments that Free Speech was making
24 to PQPR, they would still be going into the balance of
25 the trust; but you still have a debt on the note because

June 27, 2022

1 they're not paying the entire balance. So, those
2 payments that Free Speech was making, although not the
3 entire payments, would still be going into the body of
4 the trust. It was just not the \$11,000.

5 Q But the trust, as I understand it, doesn't own
6 any part of PQPR other than the debt; right?

7 A I don't think that's accurate because PLJR is
8 owned 80 percent by AEJ Trust.

9 Q But you understand if Free Speech Systems is
10 making payments to PQPR, just in the regular course of
11 business?

12 A Mm-hm.

13 Q That money -- is it your testimony that that
14 money, that is, money paid to PQPR in the regular course
15 of business, flows as income to the trust?

16 A Well, if you just do it -- if you look at -- I
17 know you don't have the spreadsheet --

18 Q I would tell you that the AEJ Trust -- I don't
19 have a spreadsheet, I don't think, that shows AEJ income.

20 A A flowchart.

21 The flowchart -- I mean, we can try to pull it
22 up at a break --

23 Q Why don't we do that. But what I'm focused
24 specifically on right now is cash income flowing to the
25 trust. And I understand one source of it to be the

June 27, 2022

1 \$11,000 debt payments beginning in November of 2021?

2 A That is one source, yes.

3 Q Thank you.

4 What I am trying to understand is whether there
5 are -- there is any other income flowing to the trust;
6 and what you started to tell me was that regular payments
7 to PQPR, in the course of business, are also flowing to
8 the trust. But I'm not aware of -- and that seemed odd
9 to me. That's what I'm trying to question you on.

10 A Maybe we can look at the flowchart at a break
11 and maybe that will answer the question. Because it's
12 hard to do it without looking at it. So, I -- you know,
13 if we could look at it. I don't want to misstate
14 anything. If we can look at the flowchart and just make
15 sure. But my impression was -- and I could be wrong --
16 was that 80 percent of PLJR is owned by the trust. So,
17 80 percent then or not 80 percent, but in the 70s --

18 Q I don't want to you do, like -- I don't want to
19 you kind of sketch out here what you think might be --

20 A Right, that's why I want to pull out -- I want
21 to pull up the --

22 MR. REILAND: Chris, can we take five
23 and --

24 MR. MATTEI: Yeah, we can take a break.
25 It's about time to take a break anyway. But

June 27, 2022

1 let me just wrap this up, though.

2 BY MR. MATTEI:

3 Q Whatever income the trust is generating,
4 whether it be the \$11,000 daily payments beginning in
5 November 2021 or some additional income beyond that, none
6 of that income is being paid to any of Mr. Jones's
7 children; correct?

8 A That's right. Yes.

9 Q It's being paid to Mr. Jones; correct?

10 A Mr. Jones is an income beneficiary of the
11 trust, yes.

12 Q Are there any other income beneficiaries?

13 A I don't believe so, no.

14 Q So, any income paid to the AEJ 2018 Trust as a
15 result of debt purportedly owed by Free Speech Systems or
16 any other income is directly for the benefit of
17 Mr. Jones; correct?

18 A Mr. Jones is an income beneficiary of AEJ
19 Trust.

20 Q So he is the sole beneficiary of any income
21 that flows to AEJ Trust as a result of its ownership of
22 PQPR's debt; correct?

23 A Through the trust, yes.

24 MR. MATTEI: Why don't we take a break.

25 THE VIDEOGRAPHER: We are off the record.

June 27, 2022

1 when the debt started accruing; correct?

2 A I don't know if I asked that specific question,
3 but these are the documents that were produced to me that
4 I reviewed. It indicates that. So, yes.

5 Q And they were produced to us as well?

6 A Yes.

7 MR. MATTEI: Can you take that down.

8 BY MR. MATTEI:

9 Q Who authorized Free Speech Systems to begin to
10 go into debt to PQPR at that time?

11 A What do you mean who authorized it? I don't
12 know that it was ever a conscious decision. PQPR was
13 sending us bills or sending Free Speech bills and we were
14 not paying the entire of the bills -- the entirety of the
15 bills. I'm not sure the reason why. I'm not sure if it
16 was -- I don't think it was a conscious decision on
17 anyone's part; but -- I don't know if -- I don't think I
18 would use the word "authorized," but --

19 Q Okay.

20 So, this is helpful. So, in 2014, PQPR is
21 sending -- in December 2014 PQPR is sending Free Speech
22 Systems bills; right?

23 A Yes.

24 Q As it had been prior to that?

25 A Sure.

June 27, 2022

1 Q But in December of 2014, Free Speech Systems
2 stops paying those bills in their entirety; correct?

3 A I don't know if they stopped, but most of the
4 bills were not being paid in their entirety.

5 Q What were those -- how was Free Speech Systems
6 billed? Was it by paper invoice, by electronic
7 submission?

8 A They were being invoiced, yes. They were being
9 invoiced.

10 Q PQPR was causing invoices to be sent to Free
11 Speech Systems?

12 A Right.

13 Q Who was responsible for receiving and
14 processing those invoices at Free Speech Systems
15 beginning in December of 2014?

16 A I don't know and I don't want to guess.

17 Q And what were those -- at that time in December
18 2014 when this debt started accruing, what was Free
19 Speech Systems being invoiced for from PQPR?

20 A For costs associated with the products, for
21 purchasing the products. So, PQPR purchases the
22 products, costs associated with housing the products.
23 There also may have been some advertising costs in there.
24 I know a couple of years there were advertising costs.

25 Q Hang on one second. Hang on one second.

June 27, 2022

1 Q Hang on a second. Hang on a second.

2 I thought you said they were sold on
3 infowarsstore.com and infowarsshop.com and you didn't
4 know who own those websites?

5 A I don't know who owns those websites, but
6 ultimately, all of those products are being sold via the
7 ads that link back to those websites. I'm not sure who
8 owns them. But -- so, when you visit a website on the
9 InfoWars.com website, you visit any article and there are
10 banners on those articles and it clicks and you can click
11 on that link to send you to the PQPR website to purchase
12 the products.

13 Q Okay.

14 But that would be the advertising is money that
15 PQPR has to pay Free Speech Systems; right?

16 A Right. And if you watch -- if you read the
17 spreadsheets, they are being given credit. So, Free
18 Speech is being given credits for those advertising.

19 Q I'm just asking you right now what PQPR was
20 invoicing Free Speech Systems for?

21 A For products.

22 Q Hang on a second.

23 So, but is Free Speech Systems buying the
24 product from PQPR? Because that I could understand,
25 right. Hey, you're buying this product from us, we're

June 27, 2022

1 selling it to you, Free Speech Systems, pay us. But
2 that's not what I understood you to be saying. What I
3 understood you to be saying is PQPR buys the products and
4 sells the products; right?

5 A PQPR, I believe, buys the products and then
6 stores the products and handles the sale end of the
7 products and packaging the products. But ultimately,
8 Free Speech pays PQPR for the product. So, it is billing
9 Free Speech for the products.

10 Q So, do you understand why this is a little bit
11 confusing -- might be a little confusing? Because if
12 PQPR is being its product and then selling its product,
13 what is Free Speech Systems getting when it pays for the
14 product? Isn't the product going to the third-party
15 customer?

16 A Right, but the cost of the product is not the
17 same thing as what it is actually being sold for.

18 Q So, why is Free Speech Systems paying for the
19 cost of the product, why wouldn't PQPR pay for that?

20 A I don't know the answer to that. I'm just here
21 to testify as to how it is.

22 Q So, Free Speech Systems' testimony is that
23 beginning -- is that one of the things it was invoicing
24 PQ -- I'm sorry. Let me start over.

25 Free Speech Systems' testimony is that one of

June 27, 2022

1 the things PQPR was billing it for was the cost of PQPR's
2 products; correct?

3 A Right.

4 Q And those bills were coming in on a monthly
5 basis to Free Speech Systems?

6 A Yes.

7 Q What else was PQPR invoicing Free Speech
8 Systems for in December 2014?

9 A I don't remember off the top of my head. It
10 may have been billing them for --

11 Q I don't want you to guess.

12 A Right. I don't remember looking at it. I
13 would -- there are documents there that could refresh my
14 recollection, more specifically the spreadsheets.

15 Q You mean the spreadsheet we were just looking
16 at?

17 A Mm-hm.

18 Q Okay.

19 Bring that up. Do you have it? Okay.

20 A So, if you could see the debits, the product
21 sales. So, that's what I was saying that the -- that
22 PQPR is billing Free Speech for. And then there are some
23 credits. So --

24 Q Hang on.

25 If we're just sitting on the debits column,

June 27, 2022

1 right, this would be, presumably, money that PQPR claims
2 it is owed by Free Speech Systems; right?

3 A Yes.

4 Q And the one source of that debt are product
5 sales. At least listed here; correct?

6 A Right. At least listed here.

7 Q And so, what I'm asking you is, beyond the
8 spreadsheet, is -- can Free Speech Systems testify as to
9 any other items for which PQPR was billing it or
10 invoicing it beginning in December of 2014?

11 A PQPR billing Free Speech; right?

12 Q Correct.

13 A I can't tell by looking at this.

14 Q Right. Okay.

15 But beyond the spreadsheet, though?

16 A Yeah, I don't know.

17 Q Well, that's kind of important because one of
18 the issues you're here to discuss are the relationship
19 between the two entities and -- so, if we close the
20 deposition today, Free Speech Systems' testimony will be,
21 beginning in December of 2014, a debt started to accrue
22 to PQPR as a result of unpaid invoices for the cost of
23 products purchased by PQPR; correct?

24 A Right. Minus other things. So, but yes.
25 Ultimately, yes.

June 27, 2022

1 Q Amongst other things, but I'm just focused now
2 on the invoice piece.

3 A Right.

4 Q Beyond the debt associated with Free Speech
5 Systems not paying for the cost of products, Free Speech
6 Systems is not aware of any other source of any debt owed
7 by Free Speech Systems to PQPR; correct?

8 A Right.

9 Q Okay.

10 So, thank you.

11 Getting back to the question that started this
12 round then, I asked you who authorized Free Speech
13 Systems to start to accrue this debt and I want to go
14 back to that question.

15 Now, we know that PQPR is invoicing Free Speech
16 Systems for the cost of its products and Free Speech
17 Systems is not paying, or at least not paying in full;
18 right?

19 A Right.

20 Q So, who made the decision at Free Speech
21 Systems to stop paying?

22 A I don't know if it was ever a conscious
23 decision. So, I don't know if it -- I just -- I don't
24 subscribe to the word "authorized" or -- you know, I
25 don't know that it was ever a conscious decision on

June 27, 2022

CERTIFICATE

STATE OF CONNECTICUT)
) SS SOUTHBURY
COUNTY OF NEW HAVEN)

I, VIKTORIA V. STOCKMAL, a Notary Public duly commissioned and qualified in and for the county of Fairfield, State of Connecticut, do hereby certify that pursuant to the notice of deposition, the said witness came before me at the aforementioned time and place and was duly sworn by me to testify to the truth and nothing but the truth of his/her knowledge touching and concerning the matters in controversy in this cause; and his/her testimony reduced to writing under my supervision; and that the deposition is a true record of the testimony given by the witness.

I further certify that I am neither attorney of nor counsel for, nor related to or employed by any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, or financially interested in the action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 18th day of July, 2022.



VIKTORIA V. STOCKMAL, RMR, CRR
Notary Public
CSR License #00251

My commission expires October 31, 2025